

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

FORD GLOBAL TECHNOLOGIES, LLC, §  
Plaintiff, §  
v. §  
NEW WORLD INTERNATIONAL, INC., § Case No.: 3:17-cv-03201-N  
AUTO LIGHTHOUSE PLUS, LLC and §  
UNITED COMMERCE CENTERS, INC., §  
Defendants. §

**APPENDIX IN SUPPORT OF DEFENDANTS' SURREPLY TO PLAINTIFF'S REPLY  
IN SUPPORT OF PLAINTIFF'S MOTION FOR ADDITIONAL ATTORNEY FEES**

Appx*	Description
185	Testimony of Expert Keith Kaucher

\* To reduce confusion, the appendix numbers assigned when the document was filed as a portion of Document 354 have been retained in this appendix filing.

Dated: October 30, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

On October 30, 2020, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or *pro se* parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5 (b)(2).

/s/ Robert G. Oake, Jr.  
Robert G. Oake, Jr.  
Attorney for DEFENDANTS

1 Q. And you've seen them sketch -- I'm sorry. Mold surfaces.  
2 Right?

3 A. Yes.

4 Q. And have you ever seen any clays that were what we've --  
5 I know you weren't at trial, but we talked about split clays.  
6 Do you know what a split clay is.

7 A. That's when they put a center line down it, and one side  
8 is different than the other to see two different variations of  
9 a design on the car.

10 Q. So like for the Mustang, for example, maybe the left-hand  
11 side was going to be the GT version and the right-hand side  
12 would be the V6 version?

13 A. It could be that, or it could be just a different --  
14 might be two versions of the GT; they might have two  
15 different --

16 Q. Do you know why they use split clays?

17 A. It's economics. It saves time, you know. You don't have  
18 to set up another whole new buck to do -- you know, do a car.  
19 You just set up one buck and you basically get essentially two  
20 for one.

21 Q. And why do you get two for one?

22 A. Because you're using the center line to split it, and so  
23 you can look from the passenger side or the driver's side to  
24 decide which side you like better.

25 Q. And automotive designers, those skilled in the art, know

1 that the left-hand side is going to be the same as the  
2 right-hand side in the ultimate product?

3 A. Right. Symmetrical, yes.

4 MR. LORELLI: Could we put up, please,  
5 Ms. Chevalier, PX 144? Could we go to the second page?

6 Q. (BY MR. LORELLI) Sir, have you seen this picture before?

7 A. No, I haven't.

8 Q. Do you know what it generally shows?

9 A. It's showing the back end of a Mustang, and it is showing  
10 -- in this particular case it looks like it's got a GT license  
11 plate, but I would say that one side is a V6 and one side's a  
12 GT.

13 Q. And in automotive design, you know that the -- in the  
14 ultimate product, the left-hand side is going to be the same  
15 as the right-hand side?

16 A. That's correct.

17 Q. They are mirror images of one another?

18 A. That's correct.

19 Q. It is the same design. Correct?

20 A. Yes. Not in this case, though.

21 Q. I'm sorry?

22 A. Not in this particular case.

23 Q. I'm sorry. Right. This is what designers use to be a  
24 shorthand, because they know that ultimately the left-hand  
25 side and the right-hand side are the same design. Correct?

1 A. Yes. That's correct.

2 Q. And about the parts in this case, the same would be true  
3 -- let's talk -- let's take a mirror, for example. The  
4 left-hand side mirror would have the same design as a right  
5 hand side mirror. Right?

6 A. That's correct.

7 Q. And the same would be true for fenders. The left-hand  
8 side fender has the same design as a right-hand side fender.

9 A. That's correct.

10 Q. The same is true for the taillight. The left-hand side  
11 taillight is the same as right-hand side taillamp.

12 A. They mirror each other.

13 Q. I'm missing one. Headlamp. Left-hand side headlamp is  
14 the same design as a right-hand side headlamp.

15 A. That is correct.

16 Q. And you understand that as an automotive designer?

17 A. Yes.

18 Q. In fact, I've seen a lot of your custom car work. In  
19 fact, often you show an image from one side of the car because  
20 your customer will expect the other side to look the same.  
21 Right?

22 A. That's correct.

23 Q. Now, right before I got up here, you said that there's  
24 rules. Did you say that you've got to follow the rules?

25 A. In regards to the patents?